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UNITED HEALTH SERVICES, INC., UHS OF DELAWARE,
INC., and VALLEY HEALTH SYSTEM, LLC

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

ANNALISA CONNELLY,
Plaintiff,

vs.

UNITED HEALTH SERVICES, INC., a
Delaware Corporation; UHS OF
DELAWARE, INC., a Delaware
Corporation; VALLEY HEALTH
SYSTEM LLC; a Delaware Limited
Liability Company,

Defendants.

CASE NO. 2:16-CV-02235-JAD-VCF

**STIPULATION AND ORDER TO EXTEND
TIME TO FILE A RESPONSIVE
PLEADING**

Plaintiff ANNALISA CONNELLY (“Plaintiff”) and Defendants UNITED HEALTH SERVICES, INC., UHS OF DELAWARE, INC., and VALLEY HEALTH SYSTEM, LLC (“Defendants”), by and through their respective counsel of record, hereby request that the Court extend the deadline for Defendants to file their first responsive pleading, which is currently set for October 18, 2016. The Complaint (**ECF No. 1**) is based on claims under the Americans with Disabilities Act and is subject to the Early Neutral Evaluation (“ENE”) process set forth in Local Rule 16-6. The parties desire to engage in the ENE process before incurring the fees and costs associated with filing a responsive pleading and any associated opposition and reply briefs. The

parties agree that conserving all possible resources for settlement at the ENE conference would further the goals of judicial economy, control of the Court's docket, and an inexpensive determination of the case. Specifically, the extension requested is for a limited and reasonable amount of time. Further, ordering Defendant to proceed with filing a responsive pleading would result in an unnecessary expenditure of resources that may impede the resolution of this matter through settlement. As a result, the parties stipulate to extend the deadline for Defendant to file its responsive pleading to 14 days after the parties participate in the ENE conference. This request is made in good faith and not to cause unnecessary delay.

Dated: October 13, 2016

Dated: October 13, 2016

Respectfully submitted,

Respectfully submitted,

/s/ Michael P. Balaban

/s/ Wendy M. Krincek

**LAW OFFICES OF MICHAEL P.
BALABAN**
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Attorneys for Plaintiff
ANNALISA CONNELLY

Attorneys for Defendants
UNITED HEALTH SERVICES, INC., UHS OF
DELAWARE, INC., and VALLEY HEALTH
SYSTEM, LLC

IT IS SO ORDERED


UNITED STATES MAGISTRATE JUDGE

DATED: October 17, 2016

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